

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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UNITED STATES OF AMERICA,

No. 1:21-cr-40

Plaintiff,

Hon. Robert J. Jonker  
Chief United States District Judge

v.

CHRISTOPHER ALLAN BODEN, a/k/a  
“Captain,” LEESA BETH VOGT, a/k/a  
“Lis Bokt,” a/k/a “Moose,” and DANIEL  
REYNOLD DEJAGER, a/k/a “Daniel  
Reynold,” a/k/a “Daniel Miester,” a/k/a  
“Danichi,”

Hon. Phillip J. Green  
United States Magistrate Judge

Defendants.

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**DEFENDANTS’ JOINT UNOPPOSED MOTION  
TO EXTEND THE DEADLINE TO FILE PRE-TRIAL MOTIONS**

Defendants Christopher Allan Boden, Leesa Beth Vogt, and Daniel Reynold DeJager, by and through their undersigned attorneys, respectfully request the Court to extend the current deadline for the parties to file their pre-trial motions.

The Court previously set a deadline of July 1, 2021 for the Defendants to file pre-trial motions and a trial date of September 21, 2021. (ECF No. 34.) Defendants have analyzed and continue to analyze and consider the potential to file a joint pretrial motion, and in light of the novel legal issues presented by this matter, respectfully request that the Court extend that deadline by 14 days to **July 15, 2021**. FED. R. CRIM. P. 12(c)(2). Defendants do not seek to alter any other dates applicable to this matter.

On June 18, 2021, AUSA Justin Presant informed Defendants' counsel via email that the United States does not object to the requested relief. Consequently, the request is "unopposed" by the United States.

Dated: June 21, 2021

/s/ Brian P. Lennon

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Dated: June 21, 2021

/s/ Brett A. Purtzer (with permission)

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Dated: June 21, 2021

/s/ Matthew G. Borgula (with permission)

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*Attorneys for Defendant Leesa Vogt*

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IT IS SO ORDERED.

Dated: June 21, 2021

/s/ Robert J. Jonker

ROBERT J. JONKER  
CHIEF UNITED STATES DISTRICT JUDGE